

CERTIFICATE OF SERVICE

I certify that on July 29, 2008, I served a copy of Defendant's Memorandum of Law in Opposition to Plaintiff's Application for the Court to Appoint *Pro Bono* Counsel and to Plaintiff's Request to Proceed *In Forma Pauperis* by e-mail and U.S. mail, postage prepaid, on the following person:

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Barry R. Fischer